

US Environmental Protection Agency
C/O Carlton D. Cuffman
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Chicago, Illinois 60604 - 3590

156577

RECEIVED

SUPERFUND PROGRAM
IDENTIFICATION BRANCH

23 July 1997

re: Information Request Sauget Areas I and II Pre-National Priorities List Superfund Site

Respondent:

Clayton Chemical Company
Sauget, Illinois.

CERTIFICATION PROVIDED:

I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATACHMENTS WERE PREPARED UNDER MY DIRECTION OR SUPERVISION IN ACORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED. Based upon my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines, and imprisonment for knowing violations. The basis for my being "aware" of penalties etc. is the statement of this fact by the E.P.A. as contained in the instructions for the preparation of this response.



Richard E. Lee

Question 1 Persons consulted in the preparation of this response:

None, other than myself. There are no employees of Clayton Chemical Company.

Question 2 Identification of Documents consulted:

None available and none consulted. All corporate records and historical records, such as they exist, are to be found at the former Clayton Chemical Company premises, currently in the care, custody and control of Mr. Tom Lightfoot, General Manager Resource Recovery Group LLC. #1 Mobile Avenue, Sauget, Illinois.

Question 3 Identification of other more potentially responsive persons:

Mr. Tom Lightfoot, General Manager, Resource Recovery Group, LLC #1 Mobile Ave. Sauget Illinois.

Question 4 List EPA Identification numbers for this facility

This information is not available to me and I refer you to the facility as mentioned in replies 1,2,& 3.

Question 5 Identity of persons who might have knowledge or information relating to wastes in the area.

Mr. Tom Lightfoot, General Manager, Resource Recovery Group LLC. Perhaps he could solicit information from present and former employees, some of whom worked at the site more or less full time for the past +15 years. I do not have a list of contacts, nor of their potential knowledge on this issue.

Question 6 List the acts or omissions of anyone causing damage
None known to me personally.

Question 7 List of all persons involved in the arrangement of waste processing, etc.
Please refer to Mr. Tom Lightfoot. Such records as they might exist are at the former Clayton Chemical Premises. I am not aware of any offsite storage of records, either presently or formerly since the start of the Company.

Question 8 Provide detailed listing of products manufactured or produced at the facility.
The Company records for activities during the period in question are available at the facility. Please contact Mr. Tom Lightfoot. I am aware the company did some waste processing which including the operation of a cracking tower. All records of processing times and production records are at the facility.

Question 9 Describe the manufacturing and recycling processes at the facility.
I am not proficient to be able to state correctly the processes employed. Please contact Mr. Tom Lightfoot.

Question 10 List of chemicals used or stored at the facility (see list).
I do not know if any of these chemicals were ever located at the facility.

Question 11 List of further details on chemicals listed on question #10:
I do not have any specific knowledge of this subject.

Question 12 Were any agents as specified used at the facility.
I do not have any specific knowledge of this subject.

Question 13 Give information relating to off-specification products
I do not have any knowledge of this subject. I suggest contact with Mr. Tom Lightfoot for a search of Company historical records for relativity to this subject.

Question 14 Describe practices used to dispose of obsolete process equipment
Please contact Mr. Lightfoot. I do not have personal knowledge of such matters. Present and former employees might be able to give accurate information.

Question 15 Describe methods used to handle or dispose of contaminated soil, etc.
I observed soil cuttings being processed as hazardous waste, even though the consultant involved advised that they could be returned to the soil area from which they were derived. This was done to complete the remediation plan for the issuance of the Part-B documentation.

Question 16 Any involvement with the Sauget family and related businesses:
None to the best of my knowledge during my time with the company. Please contact Mr. Lightfoot for a search of records and possibly a response from present and/or former employees.

Question 17 Any dead creek discharges by the Company

I believe it would have been impossible for Clayton Chemical to cause any runoff water or other waters or wastes to have been deposited or in any way to have been co-mingled with any other run-off waters or otherwise. I believe dead creek might even be above the elevation of the Clayton Chemical site.

- Question 18 Describe waste water methods prior to hook up to the village system.
I do not have any knowledge of this. Please contact Mr. Lightfoot for permission to speak to former and present employees, who might have first hand knowledge and/or general recollection of events and practices in the historical past.
- Question 19 Describe the volume, etc of waste water discharges
Please contact Mr. Lightfoot for present and historical records.
- Question 20 Provide all permits etc. copies:
All are available at the company premises.
- Question 21 Provide annual reports relating to 40CFR
All are probably available at the company premises. One would think such records would also be in possession of the federal agency receiving same. None are nor have ever been in my possession.
- Question 22 Information on groundwater flow
Please contact Mr. Lightfoot and contact Illinois EPA for their records as I heard of extensive studies having been performed on this subject.
- Question 23 Describe all measures taken to monitor or recognize haz waste at the site.
Please contact Mr. Lightfoot. He should also have the numbers for the consultant Mr. Walter Shiffrin who was heavily involved in these matters.
- Question 24 Ownership History of the facility
I never performed a historical records search of the property. I was aware that at one time it was used as a railroad terminal or turn-around facility. The Reidy family and the Reidy Family Trust held it for an extended period prior to the acquisition of the facility by Emerald Environmental LLC. Emerald defaulted on its obligations and lost the land at a sale for unpaid taxes. I do not know who is the owner of record at this time. Perhaps a contact to Mr. Ed Reidy would give further insight into historical events during the time of his management of the facility since his father's death. I do not have any current phone number for Ed Reidy. His family lawyer was Buzz Eckelkamp of Washington, Missouri.
- Question 25 Provide sampling reports
None available to me, nor have I ever seen any. Please contact Mr. Lightfoot.
- Question 26 Provide copies of liens, unsatisfied mortgages, etc.
Please see Mr. Lightfoot. As mentioned, the property was sold under a tax sale and I do not know of the purchaser. Clayton Chemical does not hold any ownership interest in any real estate what-so-ever.

End of Response:



Richard E. Lee